## **EXHIBIT B**

## Ramchandani – Search Terms Time Frame: June 1, 2013 to October 2, 2019

- Terms to run against Ramchandani ESI:
  - o All documents with the following terms in the to, from, or CC fields:
    - Citi.com
    - Citi\*
    - Cgsh.com
    - Cleary\*
    - Feig\*
    - jeff.feig@citi.com
    - jeff.feig@gmail.com
    - Ferguson\*
    - paul.nicholas.ferguson@citi.com
    - French\*
    - jeffrey.french@citi.com
    - DOJ\*
    - usdoj.gov
    - Syme\*
    - Bughman\*
    - Serino\*
    - Chu\*
    - Fredericks\*
    - Martino\*
    - Gardiner\*
    - MATTGARDINER@bloomberg.net
    - Usher\*
    - Ashton\*
    - CASHTON5@bloomberg.net
    - RUSHER2@bloomberg.net
    - Allenovery.com
  - O All documents with (Bloomberg\* OR "Wall Street Journal" OR WSJ\* OR "New York Times" OR NYT\* OR "Financial Time\*" OR FT\*) in the to, from, or CC fields, AND include (FX OR "foreign exchange" OR forex\* OR "spot market\*" OR mafia\* OR cartel\* OR "dream team" OR (team W/2 dream) OR "bandits club" OR "bandit's club" OR 1:17-cr-00019 OR "17 CR 19" OR Berman\* OR Usher\* OR Ashton\* OR Gardiner\*)
- Terms to run against Wilmer custodians [one or more Wilmer custodians sufficient to capture the primary substantive non-privileged external communications with prosecutors and witnesses in the case]
  - All documents with (Citi\* OR citi.com OR Cleary\* OR cgsh.com OR DOJ\* OR OR usdoj.gov OR Syme\* OR Bughman\* OR Serino\* OR Chu\* OR Fredericks\*

OR Martino\*) in the to, from, or CC fields, AND include (Ramchandani\* OR Rohan\* OR Gardiner\* OR Ashton\* OR Usher\* OR CASHTON5@bloomberg.net OR MATTGARDINER@bloomberg.net OR RUSHER2@bloomberg.net OR chatroom\* OR (Bloomberg w/2 chat\*) OR mafia\* OR cartel\* OR "dream team" OR (team W/2 dream) OR "bandits club" OR "bandit's club" OR 1:17-cr-00019 OR "17 CR 19" OR Berman\*)

- O All documents with (Bloomberg\* OR "Wall Street Journal" OR WSJ\* OR "New York Times" OR NYT\* OR "Financial Time\*" OR FT\*) in the to, from, or CC fields, AND include (FX\* OR "foreign exchange" OR forex\* OR "spot market\*" OR chatroom\* OR (Bloomberg w/2 chat\*) OR mafia\* OR cartel\* OR "dream team" OR (team W/2 dream) OR "bandits club" OR "bandit's club" OR 1:17-cr-00019 OR "17 CR 19" OR Berman\* OR Usher\* OR Ashton\* OR Gardiner\* OR Ramchandani\* OR Rohan\*)
- o All documents with the following terms in the to, from, or CC fields:
  - Jeff\* w/1 Feig\*
  - jeff.feig@citi.com
  - jeff.feig@gmail.com
  - Paul\* w/1 Ferguson\*
  - paul.nicholas.ferguson@citi.com
  - French\* w/1 Jeff\*
  - jeffrey.french@citi.com
  - Allenovery.com
  - Rich\* w/1 Albert
  - Maglaw.com